

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
MELISSA MARIE CALDWELL, :  
Debtor :  
: :  
JACK N. ZAHAROPOULOS, :  
STANDING CHAPTER 13 TRUSTEE, :  
Movant :  
: :  
vs. :  
: :  
MELISSA MARIE CALDWELL, :  
Respondent : CASE NO. 1-24-bk-00927-HWV

TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, this 23<sup>rd</sup> day of July 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
2. Debtor has not demonstrated that all tax returns have been filed as required by § 1325(a)(9), specifically, Debtor's 2022 federal taxes have not been filed.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 23<sup>rd</sup> day of July 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

E. Haley Rohrbaugh, Esquire  
CGA Law Firm, P.C.  
135 North George Street  
York, PA 17401

/s/ Derek M. Strouphauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee